

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON

GEORGE T. HAWES, THIRD SET  
CAPITAL LLC, AND ROSS PIRASTEH,

Plaintiff(s),

v.

KABANI & COMPANY, INC., and HAMID  
KABANI, an individual,

Defendant(s).

NO. 2:15-cv-01956-RSL

STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME TO  
ANSWER OR MOVE WITH RESPECT  
TO THE COMPLAINT

WHEREAS, on or about November 16, 2015, plaintiffs George T. Hawes, Third Set Capital LLC, and Ross Pirasteh filed a Summons and Complaint in the above – captioned action in the Superior Court for the State of Washington for the County of King;

WHEREAS, on or about December 11, 2015, Defendants Kabani & Company, Inc. and Hamid Kabani (“Defendants”) timely removed this case to the United States District Court for the Western District of Washington;

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, through their undersigned attorneys, that the time for Defendants to answer, move or

STIPULATION AND [PROPOSED] ORDER  
EXTENDING TIME TO ANSWER OR MOVE WITH  
RESPECT TO THE COMPLAINT - 1

10486-0026 5301448.doc

Case No. 2:15-cv-01956-RSL

**PREG O'DONNELL & GILLET** PLLC

901 FIFTH AVE., SUITE 3400

SEATTLE, WASHINGTON 98164-2026

TELEPHONE: (206) 287-1775 • FACSIMILE: (206) 287-9113

otherwise respond to Plaintiffs' Complaint in the action herein is extended to January 15, 2016.

DATED this 21st day of December, 2015.

PREG O'DONNELL & GILLETT PLLC

By /s/ Lori K. O'Tool

Lori K. O'Tool, WSBA #26537  
Attorneys for Defendants Kabani &  
Company, Inc. and Hamid Kabani  
901 Fifth Avenue, Suite 3400  
Seattle, Washington 98164  
Email:  
lotool@pregodonnell.com

SUMMIT LAW GROUP PLLC

By /s/ Sara A. Kelly

Sara A. Kelly, WSBA #42409  
Attorneys for Plaintiffs Hawes, Third Set  
Capital LLC, and Pirasteh  
315 5th Avenue South, Ste. 1000  
Seattle, WA 98104-2682  
Email: sarak@summitlaw.com

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2015:

Honorable Robert Lasnik

**DECLARATION OF SERVICE**

I hereby declare that on this day I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record listed below:

**Counsel for Plaintiffs George T. Hawes, Third Set Capital, LLC, Ross**

**Pirasteh:**

Sara A. Kelly, Esq.

Ralph H. Palumbo, Esq.

Summit Law Group PLLC

*sarak@summitlaw.com*

DATED at Seattle, Washington, this 21st day of December, 2015.

/s/ Lori K. O'Tool

Lori K. O'Tool, WSBA #26537

STIPULATION AND [PROPOSED] ORDER  
EXTENDING TIME TO ANSWER OR MOVE WITH  
RESPECT TO THE COMPLAINT - 3

10486-0026 5301448.doc

Case No. 2:15-cv-01956-RSL

**PREG O'DONNELL & GILLET** PLLC

901 FIFTH AVE., SUITE 3400

SEATTLE, WASHINGTON 98164-2026

TELEPHONE: (206) 287-1775 • FACSIMILE: (206) 287-9113